

U.S. DISTRICT COURT

DISTRICT OF DELAWARE

ORIGINAL

NAVE, LARRY D.

PETITIONER,

v.

CIVIL ACTION NO: OG-198-J.J.F.

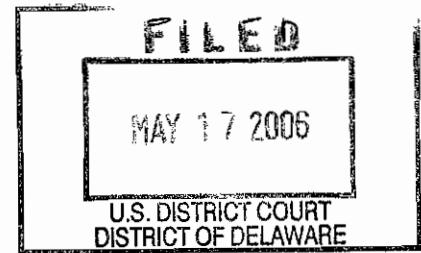
WARDEN, TOM CARDWELL,

TREATMENT SUPERINTENDANT

RON NOSTERMAN;

DEPT. OF CORR. ST. AL.

DEFENDANTS,



DO Scanned

MOTION FOR DISCOVERY

COMES NOW, LARRY D. NAVÉ, PRO-SE, PETITIONER AND
RESPECTFULLY REQUEST THIS COURT ENTER A ORDER PURSUANT TO U.S.
DISTRICT RULES OF CIVIL PROCEDURE, RULE 26 (B), (C) AND (D),
TO HAVE DEFENDANTS DELIVER TO PETITIONER THE LISTED
DOCUMENTS... THESE DOCUMENTS ARE DIRECTLY RELEVANT TO
THIS CIVIL LITIGATION AS THEY WILL SHOW THIS HONORABLE
COURT THAT BY DELAWARE LAW AND DEPARTMENT OF CORRECTIONS
STATUE, PETITIONER DOES HAVE A RIGHT TO EMPLOYMENT,
TREATMENT PROGRAMS, AS WELL AS TO DUE PROCESS BEFORE
ANY PUNISHMENTS FORCED UPON HIM... AND THAT THE
DELAWARE CORRECTIONAL CENTER CHANGED THESE STATUE
SINCE EARLIER RULINGS BY THIS COURT AND OTHERS
REGARDING INMATES HAVING A RIGHT TO EMPLOYMENT

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TREATMENT PROGRAMS AND DUE PROCESS REGARDING
PUNISHMENT BEFORE IT'S FORCED UPON PETESENCE..

D), COPIES OF THE CLASSIFICATION DIRECTIVE
BEING USED AT THE DELAWARE CORRECTIONAL CENTER... .

D), COPIES OF THE NAME AND NUMBER OF INMATES
BEING SUBJECT TO THE SAME INJUSTICE REGARDING
PETESENCE'S CLASSIFICATION.. .

3), COPIES OF EVERY CLASSIFICATION DECISION
REGARDING PETESENCE'S CUSTODY AND TREATMENT PLAN AND
OR APPEALS.. .

4), A DETAILED COPY OF THE EVIDENCE RELIED
UPON BY THE WARDEN THAT RESULTS IN THE WARDEN'S
DECISION TO CONTINUE PETESENCE'S CONFINEMENT IN A
PUNITIVE HOUSING UNIT SINCE 2002, TO DATE.. .

5), COPIES OF PETESENCE'S CUSTODY AND HOUSING
LEVEL (BEFORE) HIS TRANSFER TO WASH. STATE, D.O.C. IN 1982.. .

6), COPIES OF PETESENCE'S PRE-APPROVED
CUSTODY AND HOUSING LEVEL WHILE IN WASH. STATE BEFORE
HIS RETURN TO DELAWARE D.O.C.. .

7), COPIES OF ANY PSYCHOLOGICAL EVALUATION
CONDUCTED ON PETESENCE BETWEEN 2002, AND TO DATE.. .

8), COPIES OF THE DIRECTIVE REGARDING INMATE
EMPLOYMENT AND INMATE ASSIGNMENT TO EMPLOYMENT.. .

9), COPIES OF THE INMATE EMPLOYMENT
APPROVAL SHEET FROM 2004 TO DATE.. .

Pg. 3.

10), COPIES OF THE PRE PAROLE COMMITTEE'S
DECISION AND RECOMMENDATION REGARDING PAROLEE... .

11), COPIES OF THE DISCIPLINARY DIRECTIVE
BEING USED AT THE DELAWARE CORRECTIONAL CENTER FROM
2002, TO DATE... .

12), COPIES OF PAROLEE'S COMPLETE
DISCIPLINARY RECORDS... .

13), COPIES OF THE MULTIPLE DISCIPLINARY
TEAMS DUTIES... .

14), COPIES OF THE CHAIN OF COMMAND
MANUAL FOR THE DEL. CORR. CENTER, BY RANK AND DUTIES... .

15), COPIES OF THE CUSTODY LEVEL APPROVED
FOR THE DEL. CORR. CENTER FACILITY, BY THE DEPT.
OF CORR... .

16), COPIES OF THE DIRECTIVE STATING
WHOM IS AUTHORIZED TO MAKE AND IMPLEMENT
RULES AND REGULATIONS FOR THE DEL. CORR. CENTER... .

DATED THIS 15th DAY OF MAY 2006..

SINCERELY

Jerry Flue #169131
PAROLEE.

CERTIFICATE OF MAILING AND OR DELIVERY

THE UNDERSIGNED CERTIFIES THAT ON MAY 15TH,
2002, HE CAUSED THE ATTACHED MOTION FOR DISCOVERY,
TO BE SENT TO THE FOLLOWING PERSONS IN THE
FORM AND MANNER INDICATED:

U.S. DISTRICT COURT
844 N. KING ST.
WILM. DE. 19801

ATTORNEY GENERAL
820 N. FRENCH ST.
WILM. DE. 19801

(S) FIVE COPIES TO THE DISTRICT COURT AND ONE
COPY TO THE ATTORNEY GENERAL'S OFFICE, BY PLACING
TWO COPIES BY FIRST CLASS MAIL, POSTAGE PRE PAID,
TO EACH RECIPIENT.

Larry D. Nave
Larry D. Nave #164131
MSA. 22 DUST
DE. CORN CENTER
1181 Paddock Road
Smyrna, DE. 19877



IM JAMES L. BOYD
SBI# 164131 UNIT 220057
DELAWARE CORRECTIONAL CENTER
1181 PADDOCK ROAD
SMYRNA, DELAWARE 19977

U.S. DISTRICT COURT

899 N. King St.

Wilmington, DE.

19901

LEGAC MARS

Local Mail